

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Periodic Reporting  
(Proposal Two)

Docket No. RM2022-8

PUBLIC REPRESENTATIVE COMMENTS

(August 26, 2022)

Madison Lichtenstein (she/her/hers)  
Public Representative

Nikki Brendemuehl (she/her/hers)  
Assisting the Public Representative

## TABLE OF CONTENTS

	<i>Page</i>
I. INTRODUCTION .....	1
II. PROCEDURAL HISTORY .....	1
III. BACKGROUND .....	2
a. Docket No. R84-1 .....	2
b. Docket No. RM2020-2 .....	3
i. The Proposal .....	3
ii. The Reasons for Rejection .....	5
iii. The Suggestions .....	6
IV. SUMMARY OF PROPOSAL TWO .....	7
V. PUBLIC REPRESENTATIVE ANALYSIS AND COMMENTS .....	8
a. Data .....	9
b. Model .....	10
i. Compare the Commission's Proposed MEDBPAC Method to the Commission's Proposed LSVPTV Method .....	10
ii. Compare the Postal Service's 2019 Variabilities to the Commission's 2019 Variabilities for the MEDBPAC Method .....	12
VI. CONCLUSION .....	13

## I. INTRODUCTION

The Public Representative hereby provides comments responding to Postal Regulatory Commission (Commission) Order No. 6224.<sup>1</sup> In that Order, the Commission established Docket No. RM2022-8 to receive comments from interested persons regarding the United States Postal Service's (Postal Service) proposed changes to analytical principles relating to periodic reports.<sup>2</sup>

## II. PROCEDURAL HISTORY

On July 7, 2022, the Postal Service filed its Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two) along with a supportive study, by Professor Michael D. Bradley, Calculating Variabilities for Postmaster Costs. See Petition; Bradley Report. On July 12, 2022, the Commission issued its Notice of Proposed Rulemaking on Analytical Principles Used in Periodic Reporting (Proposal Two). See Order No. 6224. During the proceedings, the Postal Service also responded to several information requests.<sup>3</sup>

---

<sup>1</sup> Docket No. RM2022-8, Notice of Proposed Rulemaking on Analytical Principles Used in Periodic Reporting (Proposal Two), July 12, 2022 (Order No. 6224).

<sup>2</sup> Docket No. RM2022-8, Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), July 7, 2022 (Petition). A supporting study was filed along with the Petition. See Docket No. RM2022-8, Michael D. Bradley, George Washington University, Calculating Variabilities for Postmaster Costs, July 7, 2022 (Bradley Report). Supporting documents were also provided in Docket No. RM2022-8 in public Library Reference USPS-RM2022-8/1, July 7, 2022, and nonpublic Library Reference USPS-RM2022-8/NP1, July 7, 2022.

<sup>3</sup> Docket No. RM2022-8, Responses of the United States Postal Service to Questions 1-5 of Chairman's Information Request No. 1, July 22, 2022 (Response to CHIR No. 1); Docket No. RM2022-8, Responses of the United States Postal Service to Questions 1-4 of Chairman's Information Request No. 2, August 5, 2022 (Response to CHIR No. 2); Docket No. RM2022-8, Responses of the United States Postal Service to Questions 1-6 of Chairman's Information Request No. 3, August 10, 2022 (Response to CHIR No. 3).

### III. BACKGROUND

#### a. Docket No. R84-1

Docket No. R84-1 established the current methodology used to attribute Postmaster costs to products. It relies on data from FY 1979.<sup>4</sup> The dataset contains ten observations, with one entry for each grade level from EAS-A to EAS-22, each including data on minimum Postmaster salary and weighted average of Work Service Credits (WSCs).<sup>5</sup>

Docket No. R84-1 estimates a level-log regression model (i.e., semi-log model), which has the following form:<sup>6</sup>

$$Y_i = \beta_0 + \beta_1 * \ln(X_i) + \varepsilon_i$$

The dependent variable, represented by  $Y_i$ , is the minimum Postmaster salary in the  $i^{\text{th}}$  grade level. The independent variable, represented by  $X_i$ , denotes the weighted average of WSCs in the  $i^{\text{th}}$  grade level.  $\beta_0$  and  $\beta_1$  represent the coefficients for the intercept and the slope, respectively. Finally,  $\varepsilon_i$  is the stochastic error term for each grade level.

To calculate the overall variability, the estimated slope coefficient from the level-log model is divided by the overall sample mean of minimum Postmaster salary:

$$Variability = \frac{\hat{\beta}_1}{\bar{Y}}$$

---

<sup>4</sup> Docket No. R84-1, Direct Testimony of Nai-Chi Wang on Behalf of the United States Postal Service, November 10, 1983, at 28.

<sup>5</sup> To view the dataset, see Docket No. R84-1, Direct Testimony of Nai-Chi Wang on Behalf of the United States Postal Service, November 10, 1983, at 39, Exhibit USPS-12C.

<sup>6</sup> Docket No. R84-1, Direct Testimony of Nai-Chi Wang on Behalf of the United States Postal Service, November 10, 1983, at 42, Exhibit USPS-12F (Exhibit USPS-12F); Docket No. RM2020-2, Michael D. Bradley, George Washington University, Investigating the Variability of Postmaster Costs, November 29, 2019, at 3 (Docket No. RM2020-2, Bradley Report).

Exhibit USPS-12F at 44-45. When the values from the dataset and estimated model are substituted into the equation, it results in a variability of 18.2 percent. This remains the current Postmaster variability used today.

However, Prof. Bradley notes in Docket No. RM2020-2 that after this methodology was adopted, the Commission “established the practice of performing [the variability] calculation at the mean value of the key independent variable[.]” Docket No. RM2020-2, Bradley Report at 3-4. Therefore, the variability calculation divides the estimated slope coefficient by the minimum Postmaster salary evaluated at the sample mean of WSCs:

$$Variability = \frac{\hat{\beta}_1}{Y(\bar{X})}$$

*Id.* at 4. This calculation results in a variability of 13.3 percent. *Id.*

b. Docket No. RM2020-2

The Commission established Docket No. RM2020-2 (Proposal Ten) to receive comments on the Postal Service’s initial proposed update to the process of attributing Postmaster costs to products. Although the respective proposal was rejected, the Commission did provide further suggestions as to how to improve the proposal before refiling if the Postal Service chose to do so. The Commission subsequently established Docket No. RM2022-8 (Proposal Two) to receive comments on the Postal Service’s revised proposal with the same goal of updating the attribution process of Postmaster costs.

i. The Proposal

The Postal Service asserted that the attribution process for Postmaster costs developed in Docket No. R84-1, and summarized in Section III.a. above, needed to be updated due to the development of an expanded dataset (which consisted of grade level indicators and WSCs for Post Offices) and the impact of three significant postal changes.

This expanded dataset was collected in April 2019 and consists of 13,611 Post Offices.<sup>7</sup> The three referenced changes are described as follows:<sup>8</sup>

First, in order to preserve rural post offices, the Postal Service instituted a process, known as the Postal Service's Post Office Structure Plan or POSTPlan that not only changed the hours at smaller post offices, but also changed the Postmaster compensation structure. Following the implementation of POSTPlan, post offices that were in the EAS grades below EAS-18 are no longer in the EAS system.

Second the Postal Service recently split the EAS-18 grade into two grades, a "new" EAS-18 grade, and an EAS-18B grade. Finally, the Postal Service periodically updates the Postmaster salary scale, revising the amount of salary paid for each grade. The most recent salary schedule was established in January 2019, and this is relevant because the relative sizes of the salary steps can affect the estimated variability.

As a result, the Postal Service proposed a new methodology for attributing Postmaster costs to products that reflected this new data and the relevant postal changes. Despite the many developments made in Docket No. RM2020-2, the case's Public Representative and the Commission both found reasons to reject the proposal. The Commission, in the end, effectively rejected the case for four reasons while also providing suggestions on how to improve the proposal. Section III.b.ii. will elaborate on these reasons while Section III.b.iii. will summarize the Commission's suggestions.

---

<sup>7</sup> *Id.* at 9. The 13,611 observations are notably larger than the 10 observations used in the analysis conducted in Docket No. R84-1. Docket No. RM2022-8 considers updated data from 2022. Petition at 1.

<sup>8</sup> See Docket No. RM2020-2, Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Ten), November 29, 2019, at 2. A more recent salary schedule was published for 2022 and is available at <http://naps105.org/Documents/NAPS%20Salary%20Range%20Decision%20January%202022.pdf>.

ii. The Reasons for Rejection

The Commission provided four reasons leading to its conclusive rejection of Proposal Ten in Docket No. RM2020-2, which are summarized below:<sup>9</sup>

The first problem is related to the choice of the WSC percentage change, which is used in Proposal Ten to perform the re-classification of Post Offices and the corresponding percentage change in the cost... The second problem concerns the specific transformation of the sample used to derive the tallies from the re-classification and, hence, the cost change... The third problem concerns the failure of the Postal Service to use clear criteria in its sensitivity analysis that can be relied upon to choose the scaling factor used to implement changes in WSCs... The fourth problem concerns the unidirectional nature of the proposed variability, which, for each given pair of EAS pay grades underlying a separate logistic regression, only considers possible moves of post offices from the lower to the higher of the two grades.

In its discussion of its first reason for rejecting the proposal, the Commission regarded the method used by the Postal Service in Proposal Ten to select the WSC percentage change as “excessive” and its subsequent analysis as “imprecise and vulnerable to value judgement.” Order No. 5932 at 45. Consequently, the Commission concluded that “[t]his procedure does not conform to the Postal Service’s practice of variability calculation, nor to the general econometric practice, and the Postal Service lacks sufficient historic data to allow for the calculation of a realistic WSC growth rate.” *Id.*

Regarding its second reason, the Commission maintained that the Postal Service did not provide sufficient rationale in support of its sample transformation method being preferred to others. This resulted in the Commission claiming “[t]he lack of robustness of the variability with respect to the assumed change in WSCs is in the Commission’s view a shortcoming of the proposed method.” *Id.* at 46.

---

<sup>9</sup> See Docket No. RM2020-2, Order on Analytical Principles Used in Periodic Reporting (Proposal Ten), July 8, 2021, at 45-46 (Order No. 5932).

The third reason provided by the Commission was that the Postal Service's sensitivity analysis was not explicit with regards to providing "precise criteria on which the change in the WSCs is based in the re-classification procedure." *Id.* at 41.

The fourth reason provided by the Commission comments on the Postal Service's assumption that Post Offices can solely move "from the lower to the higher of the two grades" being studied but not in the other direction, also. *Id.* at 46. Specifically, the Postal Service did not provide sufficient reasoning in support of its claim.

### iii. The Suggestions

The Commission, upon rejecting Proposal Ten, provided two alternative approaches, the Large Sample Approach and the Geometrical Approach, with the intention that the Postal Service would choose one of these approaches as the basis for a subsequent Proposal if it were to file again on this matter.<sup>10</sup> The former approach is similar to Proposal Ten and makes use "of Bayes classifier which, in theory, minimizes the probability of misclassification" when predicting total cost conditional on WSCs while the latter is similar "to the Postal Service's practice in variability calculations used for other cost segments" and makes use of "the Euclidean distance between the target prediction and the prediction" when predicting total cost conditional on WSCs. See Order No. 5932 at 47-48; A5 at 17. Both approaches assume "the logistic model is correctly specified" as in Proposal Ten. A5 at 1. The Commission provided these alternative approaches to resolve its four reasons for rejecting Proposal Ten, as described in Section III.b.ii.

Due to the construction of the EAS grade structure, the WSC distribution across EAS grades is discrete—it reflects that of a jump / step distribution in which WSCs are continuously distributed within EAS grades but not between EAS grades. The Large

---

<sup>10</sup> See Docket No. RM2020-2, Library Reference PRC-LR-RM2020-2/5, July 8, 2021, Microsoft Word file "A5.docx," File A5: Suggested Approaches to Address the Shortcomings of Proposal Ten (A5) for a more detailed description of the Large Sample Approach and the Geometrical Approach. Please note the Large Sample Approach is also referred to as "The 'Large Sample Version of Proposal Ten Variability' (LSVPTV) method" while the Geometrical Approach is also referred to as "the Minimization of Error Distance Between Predicted and Actual Cost (MEDBPAC) method." *Id.* at 1, 12 (cited in Petition at 3-4). The Postal Service initiated Proposal Two in response to these two suggestions.



Sample Approach recognizes this characterization and evaluates the variabilities as the sample sizes for each EAS grade tend towards infinity. This essentially results in the WSC distribution across EAS grades being continuous. Following this, a standard analysis is then conducted by means of calculus along with a singular classification (rather than two as in Docket No. RM2020-2). *Id.* at 2.

While the Geometrical Approach does assume the same structure for its logistic models as those employed in Proposal Ten, it “does not perform any classification of post offices [as done twice in Proposal Ten]. It is based on the best prediction of the total cost with respect to the criterion of minimization of the prediction error among all possible prediction functions.” *Id.* at 12, 15. Additionally, this approach does not necessitate a large sample approximation, but, rather, makes use of the finite size of each of the datasets for the EAS grades 18 through 26.

#### IV. SUMMARY OF PROPOSAL TWO

Utilizing the Commission’s evaluation of Proposal Ten and suggestions for improvement, the Postal Service presents Proposal Two, which seeks to update the data and methodology used to estimate and calculate the variabilities for Postmaster costs.

The proposed data come from PS Form 150, Postmaster Workload Information. Specifically, Proposal Two uses the February 2022 data, which include 13,592 Post Offices. Bradley Report at 14. The data contain information on EAS grade level, WSC, and Fair Labor Standards Act (FLSA) status. The following EAS grade levels are included in the data: EAS-18, EAS-18B, EAS-20, EAS-21, EAS-22, EAS-24, and EAS-26.

To prepare the sample dataset for estimation, Prof. Bradley proposes examining the dataset for out-of-bounds observations by establishing upper and lower cutoff values for each EAS grade pair beyond their respective upper and lower Zones of Tolerance and then identifying Post Offices with WSCs outside of those cutoff values. In total, “only 22 of 13,592 offices” are identified as being out-of-bounds. *Id.* at 19. These Post Offices are removed from the sample dataset.

Using this dataset, Prof. Bradley proposes estimating six logistic models, one for each EAS grade pair. The logistic models quantify the probability of a Post Office moving from a lower EAS grade, such as EAS-18, to a higher EAS grade, such as EAS-18B, as determined by the respective EAS grade's minimum Postmaster salary. When evaluating the fit of the models, Prof. Bradley relies on the Cox-Snell  $R^2$  and Hosmer-Lemeshow statistics. Once the out-of-bounds observations are removed from the sample dataset, the results from these tests indicate "there is no evidence suggesting that any of the models are not good fitting." *Id.* at 20; Docket No. RM2020-2, Bradley Report at 26-27.

To calculate the variabilities, Proposal Two uses the Commission's suggested Geometrical Approach over the Large Sample Approach. The Bradley Report states that the Geometrical Approach "is more transparent, requires no additional estimations, is straight-forward to calculate, and is consistent with the economic theory underlying the calculation of attributable costs." Bradley Report at 14.

From the Geometrical Approach, Proposal Two derives a "simplified variability algorithm[.]" *Id.* at 22. The proposed calculation for "[t]he overall variability is the overall marginal cost times overall WSC, divided by total cost for the pair of EAS grades." *Id.* at 13. Proposal Two estimates an overall variability of 3.03 percent. *Id.* at 38.

The proposed overall variability of 3.03 percent is smaller than the current overall variability of 18.2 percent. However, according to the Bradley Report, "[b]ecause unit Postmaster costs are low to begin with, the reduction in variability does not have a large impact on those costs." *Id.* at 41.

## V. PUBLIC REPRESENTATIVE ANALYSIS AND COMMENTS

The Postal Service claims its Petition "closely follow[s] the explicit proposals the Commission put forth [in Order No. 5932] to resolve its concerns, without modifying those parts of Proposal Ten that were not of concern." Petition at 2. It then claims the Commission rejected Proposal Ten due to its "method of variability calculation" which is, thus, the focus of Proposal Two. *Id.* The Public Representative agrees with this claim and

interpretation. As a result, the Public Representative's analysis and comments will focus on the decision of the Postal Service to pursue the MEDBPAC method.

The Postal Service did conduct an analysis on an updated dataset, but this dataset was simply a more recent version of the 2019 dataset rather than a completely new dataset. By doing so, it provided updated variabilities that better reflect the current state. It also conducted an analysis on the 2019 dataset initially to ensure its method produced the same results as the Commission's method in Docket No. RM2020-2. Although the results were not exactly the same, the Postal Service concluded they were close enough to ensure it accurately replicated the Commission's method. *Id.* at 7.

Although the dataset's structure remained essentially the same between 2019 and 2022 (with the sole addition of an FLSA variable), Section V.a. will comment on the accuracy and reliability of the 2022 data with a focus on the outliers. Section V.b. will then comment on the models proposed by the Commission and the Postal Service's analysis.

a. Data

After reviewing the relevant materials, the Public Representative finds the quality of the proposed data to be an improvement compared to the existing data. Proposal Two relies on operational data already collected by the Postal Service. Compared to the FY 1979 data currently used, the proposed data better approximate the Postal Service's present EAS system. Furthermore, the data on WSC in Proposal Two include Post Offices' actual WSC values instead of a grade's weighted average of WSC.

The examination of Proposal Two yielded questions relating to out-of-bounds observations seen in the data. The Postal Service acknowledges that "[t]he most likely reason for the existence of this very small number of out-of-bounds offices is data error." Response to CHIR No. 3, question 2.b. The data include "offices whose WSCs are strongly inconsistent with their EAS grade [which] can have an undue influence on the estimated logit models and cause them to have a relatively poor model fit." Response to CHIR No. 2, question 2. To address this issue, the Postal Service establishes boundaries for each EAS grade. This approach finds 22 Post Offices with out-of-bounds observations.

The Public Representative understands the need to deal with out-of-bounds observations and acknowledges the Postal Service's approach in doing so.

Additionally, the Postal Service answered a question requesting information about the use of data from a single time period, February 2022. The Postal Service confirmed that the February 2022 data is "representative of the typical distributions of [EAS] gradings and WSCs and that these distributions do not fluctuate seasonally throughout the year in a meaningful way." Response to CHIR No. 1, question 3.e. The Postal Service rationalizes that "there is little change in WSCs and EAS grades through time[.]" Response to CHIR No. 1, question 3.c. The information in the Response to CHIR No. 1, question 3 satisfied the Public Representative's concerns over the use of a single time period. Overall, the Public Representative finds that Proposal Two improves the quality of data used to attribute Postmaster costs.

b. Model

i. Compare the Commission's Proposed MEDBPAC Method to the Commission's Proposed LSVPTV Method

As mentioned in Section IV., the Postal Service concluded the MEDBPAC method is preferred to the LSVPTV method. This was determined after a thorough theoretical evaluation of the two methods on the basis of the following two questions:<sup>11</sup>

1. Does the method require any additional assumptions or estimations and how open ended are they?
2. How well does the method comport with the underlying economic theory of calculating attributable costs?

See Bradley Report at 10.

The Postal Service concluded the MEDBPAC method better met these two criteria than the LSVPTV method. Although this may be true, since it based its conclusion off of

---

<sup>11</sup> The Commission ensured these two methods answered certain questions and met certain criteria of its own, too. See A5 at 2.

criteria it constructed, it is necessary to determine if these criteria are sufficient to determine preference or if additional criteria need to be considered. This section will evaluate the two methods and criteria to determine if the Postal Service's rationale has merit.

Based on the Postal Service's theoretical comparison, its justification has value. Noting the MEDBPAC method requires fewer additional assumptions and estimations than the LSVPTV method greatly supports the MEDBPAC method being utilized as this minimizes the degree of subjectivity involved in the attribution of Postmaster costs. Bradley Report at 10 (citing A5 at 10). By providing proof that the MEDBPAC method's variability can be derived through traditional economic theory, it supports the Commission's claim that "[t]his approach is closer to the Postal Service's practice in variability calculations used for other cost segments [than the other approach]." Bradley Report at 12-14; Response to CHIR No. 3, question 1; Order No. 5932 at 48. Use of this method would then permit the attribution of Postmaster costs to better align with standard practices in other segments. Therefore, the Postal Service correctly approved the MEDBPAC method.

In addition to the two questions posed by the Postal Service mentioned above, the Commission also had questions and criteria which these methods had to satisfy. See A5 at 2. For instance, its four reasons for rejecting Proposal Ten were remedied by both suggested methods. As a result, both the Postal Service and the Commission ensured the method chosen satisfied criteria they deemed important. However, the Public Representative maintains that a clear set of criteria would have been preferred to criteria drafted separately by the Commission and the Postal Service. Nevertheless, since the Commission had not outlined explicit criteria to use in determining the preferred method, the Public Representative suggests the selected method should not only satisfy the Commission's and the Postal Service's criteria, but also specifically benefit the public such as through transparency and cohesiveness to methods used in other cost segments similar to Postmaster costs. These additional criteria would not only facilitate the public's ability to compare the various cost segments but also to conduct independent reviews of the methods used in attributing costs. As highlighted throughout both the Commission's

and the Postal Service's review of these methods, it is in the Public Representative's opinion that the MEDBPAC method satisfies both of these criteria and would be of benefit to the public. Bradley Report at 14; Order No. 5932 at 48.

ii. Compare the Postal Service's 2019 Variabilities to the Commission's 2019 Variabilities for the MEDBPAC Method

In order to be completely thorough, and ensure accuracy, the Postal Service did a comparative analysis on the 2019 data to determine if it replicated the Commission's MEDBPAC method precisely.<sup>12</sup> This consisted of applying the MEDBPAC approach to the 2019 data and then comparing the resulting EAS grade variabilities to those provided by the Commission in Table 6 of Order No. 5932. Order No. 5932 at 49.

Upon comparison, the Postal Service states "[t]he results of the two versions of the methodology [(i.e., the Commission's version and the Postal Service's version)] are identical for four of the six EAS grade pairs, and are sufficiently close for the remaining two to be confident that the Postal Service's application of the MEDBPAC approach is producing the same variabilities as the Commission's original application." Petition at 7. This is illustrated in Table 7 of the Bradley Report. Bradley Report at 23.

Although the two differences are relatively small, as the Postal Service mentioned, their presence is concerning as it could mean there are errors in the MEDBPAC methodology, especially given the discrepancies exist for the EAS grade pairs specifically containing EAS-18 and EAS-18B grades. This is important as the grade formerly known as EAS-18 was split in FY 2019 into EAS-18 and EAS-18B. Docket No. RM2020-2, Bradley Report at 5. As a result, further investigation was conducted to evaluate the cause of this discrepancy.

---

<sup>12</sup> This was needed as, according to the Postal Service, "Commission Library Reference PRC-LR-RM2020- 2/5 does not contain any documentation about, or present the programs for, the calculation of the MEDBPAC variabilities. The variabilities appear solely as an entry in a table, so it is not possible to trace what might be the source of the minor discrepancy." Bradley Report at 23. It would be beneficial for the Commission to make these programs publicly available in order to facilitate a comprehensive comparison of the two parties' MEDBPAC methods.

The Postal Service suggests this difference in variabilities could potentially be due to the Commission using STATA for its analysis, the Postal Service using SAS for its analysis, and “the two variabilities including the EAS-18B grade also hav[ing] the largest number of observations[.]” Bradley Report at 23. Though this may have influenced the results, the Public Representative notes an error in Table 8 of the Bradley Report which continued into the Postal Service’s code in folder Directory 1 - MEDBPAC 2019 which likely contributed greatly to the differences.<sup>13</sup> This table indicates the minimum salary for grade EAS-18B in 2019 was \$59,300; however, its source states this to be \$59,330.<sup>14</sup>

Making this substitution in the relevant code results in the variability for EAS-18 to be 4.83 percent and the variability for EAS-18B to be 5.33 percent, which are precisely what the Commission computed in Docket No. RM2020-2. See Order No. 5932 at 49. Therefore, with this change implemented, the Postal Service will be able to replicate the Commission’s MEDBPAC method and revise Table 7 in the Bradley Report. Bradley Report at 23.

As a result, the Public Representative concludes that, with these minor changes implemented, the Postal Service was able to replicate the Commission’s MEDBPAC approach. Furthermore, if the Commission decides to approve Proposal Two, the Public Representative recommends it does so conditioned on the implementation of these changes.

## VI. CONCLUSION

In order for the Public Representative to recommend that the Commission approve the model presented by the Postal Service in Proposal Two, the proposed modifications must “improve the quality, accuracy, or completeness of the data or analysis of data

---

<sup>13</sup> See Bradley Report at 25; Docket No. RM2022-8, Library Reference USPS-RM2022-8/1, July 7, 2022, folder “Directory 1 - MEDBPAC 2019.”

<sup>14</sup> Docket No. RM2020-2, Bradley Report at 11; Bradley Report at 25. See the initial 2019 EAS Salary Schedule at [unitedpma.org](https://www.unitedpma.org/docs/default-source/default-document-library/npa/pay-package_postmasters-07-20-2018.pdf?sfvrsn=9b8c608d_2), available at [https://www.unitedpma.org/docs/default-source/default-document-library/npa/pay-package\\_postmasters-07-20-2018.pdf?sfvrsn=9b8c608d\\_2](https://www.unitedpma.org/docs/default-source/default-document-library/npa/pay-package_postmasters-07-20-2018.pdf?sfvrsn=9b8c608d_2), and the revised 2019 EAS Salary Schedule at [naps.org](https://naps.org/files/galleries/Board_Memo_039-18.pdf), available at [https://naps.org/files/galleries/Board\\_Memo\\_039-18.pdf](https://naps.org/files/galleries/Board_Memo_039-18.pdf).

contained in the Postal Service's annual periodic reports to the Commission[.]” 39 C.F.R. § 3050.11(a). For the reasons discussed above, the Public Representative finds the quality of the data and the analysis of the data to be an improvement. The Public Representative respectfully submits the foregoing comments for the Commission’s consideration.

Respectfully submitted,

Madison Lichtenstein  
Public Representative

901 New York Avenue, NW, Suite 200  
Washington, DC 20268-0001  
Office Phone: (202) 719-0742  
Email: [madison.lichtenstein@prc.gov](mailto:madison.lichtenstein@prc.gov)